

REMARKS

Claims 1-7 remain pending in the application.

The Applicants respectfully request the Examiner to reconsider earlier rejections in light of the following remarks. No new issues are raised nor is further search required as a result of the changes made herein. Entry of the Amendment is respectfully requested.

Claims 1-7 over Huang

In the Office Action, claims 1-7 were rejected under 35 USC 102(b) as allegedly being anticipated by WO 97/23078 to Huang (“Huang”). The Applicants respectfully traverse the rejection.

Claims 1 and 2 recite a single coder/decoder to **selectively input one of a plurality of analog signals** and to selectively output an encoded signal to a plurality of processors. Claims 3-7 recite a single coder/decoder to **selectively input one of a plurality of digital signals** and to **selectively input one of a plurality of analog signal inputs** and a first plurality of processors multiplexed to the single coder/decoder. Thus, claims 1-7 recite a system and method that relies on a single coder/decoder to **selectively input one of a plurality of analog signals**.

The Examiner argues in the Response to Arguments section of the Office Action June 23, 2005 that Huang discloses a digital/analog conversion 15 that equates to the claimed features, i.e., “single if it is one of the two in the pair itself is a single converter” (see page 4), suggesting that the Examiner can **IGNORE** the fact that Huang discloses two digital/analog converters.

Thus, the Examiner **ACKNOWLEDGES** that Huang discloses a **PAIR** of coders/decoders, A **pair** of coders/decoders is by definition **two** coders/decoders. By any interpretation **two** coders/decoders is **NOT** a **single** coder/decoder, i.e., the recited **single** coder/decoder does **NOT** read on Huang’s **two** coders/decoders. One of a pair of coders/decoders is just that, one of a **PAIR** of coders/decoders. Huang’s invention could not operate properly without a pair of coders/decoders and thus the Examiner cannot simply **IGNORE** the fact that there **TWO** coders/decoders. An important claimed feature is a **SINGLE**

coder/decoder that overcomes the deficiency within the art of having to use a PLURALITY of coders/decoders. Hence, the rejection should be withdrawn because it fails to demonstrate that the applied reference discloses each and every element of the claim. See MPEP 2131. "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). "Anticipation cannot be predicated on teachings in the reference which are vague or based on conjecture." *Studiengesellschaft Kohle mbH v. Dart Industries, Inc.*, 549 F. Supp. 716, 216 USPQ 381 (D. Del. 1982), *aff'd.*, 726 F.2d 724, 220 USPQ 841 (Fed. Cir. 1984). If the Examiner continues to ignore claimed features, the Examiner is respectfully requested to call Applicants to discuss the claimed features.

As discussed above, Huang discloses a pair of A/D and D/A converters (see Fig. 3a, item 15). Each A/D and D/A converter accepts ONE input (item 14) for output to a time-division multiplexed bus (item 19). Thus, each of Huang's A/D and D/A converters input a SINGLE input, and does NOT selectively input one of a plurality of analog signals, much less selectively input and output a signal from and to a plurality of processors, as recited by claims 1-7.

The Applicants specifically recite a single coder/decoder coupled to a plurality of processors because a single coder/decoder overcomes the deficiencies in the prior art, such as Huang's use of a plurality of coders/decoders that increase costs. A system relying on a plurality of coders/decoders is proportionally expensive relative to the number of coders/decoders used. However, by multiplexing a single coder/decoder a system can service a plurality of processors at a reduced cost. The cited prior art fails to disclose the claimed features having such benefits.

For these and other reasons, claims 1-7 are patentable over the prior art of record. It is therefore respectfully requested that the rejections be withdrawn.

Conclusion

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,



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